

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In Re: W.R. GRACE & CO., et al.,  
Debtors,

Chapter 11  
Bankruptcy No. 01-01139 (JFK)  
(Jointly Administered)

**NOTICE OF SERVICE OF ZAI CLAIMANTS' SECOND SET OF  
INTERROGATORIES AND REQUESTS FOR PRODUCTION TO DEBTORS**

PLEASE TAKE NOTICE, that on this 16<sup>th</sup> day of October, 2002, a copy of ZAI Claimants' Second Set of Interrogatories and Second Set of Requests for Production to Debtors, was served on counsel for the Debtors as set forth below:

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DATED: October 16, 2002

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**CERTIFICATE OF SERVICE**

I, William D. Sullivan, Esquire, hereby certify that on October 16, 2002, service of the foregoing

- **NOTICE OF SERVICE OF ZAI CLAIMANTS' SECOND SET OF INTERROGATORIES AND REQUESTS FOR PRODUCTION TO DEBTORS**

was made upon the attached Mail Service List via first class mail.

Dated: October 16, 2002

/s/ William D. Sullivan  
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**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:	)	Chapter 11
	)	
W.R. GRACE & CO., <u>et al.</u> ,	)	Case No. 01-01139 (JKF)
	)	(Jointly Administered)
	)	
Debtors.	)	Objection Deadline: November 15, 2002
	)	Hearing Date: TBD only if necessary

**ZAI CLAIMANTS' SECOND SET OF  
REQUESTS FOR PRODUCTION TO DEBTORS**

1. All material safety data sheets for ZAI and any expanded vermiculite that was used for ZAI.
2. All consumer inquiries regarding ZAI and responses thereto.
3. The following specific documents:
  1. August 8, 1986 Wolter – Schippereit Memo
  2. July 23, 1986 McCaig – Wolter Memo
  3. P.J. Walsh May 20, 1983 Memo to District Managers concerning questions regarding attic insulation
  4. The file known as “Wolter Binder Development Program I”
  5. The file known as “Wolter Binder Development Program II”
  6. The file known as “Binder Development Program 1981 – 1983” (consisting of documents with a bates stamp range 756886 – 756953)
  7. The file entitled, “T&As Sampling 1980 I” apparently consisting of documents bates stamped 757860 – 758113
  8. The file entitled, “Strategy Plans 1982”
  9. The document entitled, “Meeting of January 27, 1977 on the Effects of Tremolite”
  10. The file entitled, “Slot Screen Attic Insulation – Simulated Attic Tests”

11. The April 21, 1987 Memo L. Locke to S. Venuti regarding removal and rebagging of AI
  12. March 31, 1986 Letter from D. Carlson to General Motors regarding MSDS for AI
  13. February 20, 1986 Memo from R. Ericson to File regarding allergic reaction to ZAI
  14. March 28, 1986 Letter from S. Venuti to A. Latham (College Park, Maryland) regarding tremolite in AI
  15. September 6, 1967 Memo from Upchurch to Bjorklund regarding attic insulation
  16. November 30, 1965 article, "New Insulation Service Offered to Homeowners"
  17. February 12, 1968 Letter from John D. Enloe to Zonolite regarding request for vermiculite information
  18. February 23, 1973 Memo from Skyles to McDougall regarding attic insulation – plastic bags
  19. The folder marked "Asbestos" containing vermiculite and tremolite studies, memos as to levels, testing and percentages
- 
4. All documents from the Washington Research Center regarding attic insulation.
  5. Documents comprising the file "Tremolite Guidelines" beginning with bates number 15103459 and apparently running through bates number 15103912.
  6. All bags or containers for ZAI.
  7. All photographs of bags or containers for ZAI.

DATED: October 16, 2002

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**CERTIFICATE OF SERVICE**

I, William D. Sullivan, Esquire, hereby certify that on October 16, 2002, service of the foregoing

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was made upon the attached Mail Service List via first class mail.

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12. R.W. Vinion
  13. D.D. Walczyk
  14. E.S. Wood
  15. S. Venuti
  16. J.H. Wilson
  17. R.H. Locke
  18. Gray Winey
  19. W.R. Hanlon
3. Did ZAI bags contain any code or other identifying data from which the date of manufacture of the bag, the date it was filled or its date of shipment from the plant can be determined? If so, please explain the code and the information that can be derived from the code.
  4. Did the size, shape, color, design or writing on ZAI bags change over time? If so, please state the date of each change and describe the change.

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